

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Earline Johnson,

Plaintiff,

v.

Kimsrun Deth and Kim Transport, Inc.,

Defendants.

C/A No. 3:18-cv-02015-JFA

**JOINT MOTION TO EXTEND  
EXPERT WITNESS DEADLINES**

The parties by and through their undersigned counsel, hereby move pursuant to Rule 16(b)(4), FRCP, and Local Civil Rule 16.02, to amend the scheduling order for good cause shown, specifically the deadline for the parties to disclose expert witnesses. This motion is based upon the following:

1. The Court filed its amended scheduling order on September 28, 2018, which included a deadline for the Plaintiff's expert witness disclosures of January 31, 2019 and the Defendants' expert witness disclosures of March 4, 2019.

2. Plaintiff respectfully requests an additional 45 days to March 15, 2019, in order to comply with the deadline, and that the Defendants' deadline to name expert witnesses be extended to April 19, 2019.

3. The parties do not anticipate that extending these deadlines will affect any other deadlines in the current scheduling order, including the trial date.

4. The parties have been working towards two ends: (1) setting the deposition of the defendant driver who speaks limited English and lives in California to determine whether there are any additional assets or insurance coverages that may apply to this case as there are numerous

claimants other than the Plaintiff; and (2) setting a global settlement conference as the insurance carrier for the defendants has issued a global tender of its policy limits.

5. To date, written discovery has been served on the defendants and the defendant driver's deposition has been scheduled for February 12, 2019. Whether additional discovery will be needed will likely depend on whether the case resolves at the settlement conference.

6. As evidenced by the signatures below, all parties consent to the extension and new proposed deadlines for expert witness disclosures.

Respectfully submitted,

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January 30, 2019

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January 30, 2019